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23 UNITED STATES DISTRICT COURT

24 DISTRICT OF NEVADA

25 MAUREEN CLARK and SONYA
26 ALEXANDER, individually, and on behalf of
27 all others similarly situated,

28 Plaintiff,

vs.

BANK OF AMERICA CORPORATION,

Defendant.

CASE NO. 2:16-cv-02228-GMN-VCF

**STIPULATION TO EXTEND TIME FOR
PARTIES TO RE-SUBMIT PROPOSED
NOTICE AND CONSENT-TO-SUE
FORMS**

Complaint Filed: September 21, 2016

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29 *Attorneys for Plaintiffs MAUREEN CLARK and*
30 *SONYA ALEXANDER*

RECITALS

2 On September 21, 2016, Plaintiffs MAUREEN CLARK and SONYA ALEXANDER
3 (“Plaintiffs”) filed a putative class and collective action complaint in the United States District
4 Court, District of Nevada (Dkt. #1);

5 On June 22, 2018, Plaintiffs filed their Second Amended Class and Collective Complaint
6 (Dkt. #52);

On March 31, 2019, the Court granted Plaintiffs' Pre-Discovery Motion for Conditional Certification Pursuant to 29 U.S.C. § 216(b) and ordered the parties to meet and confer to correct certain deficiencies the Court identified in Plaintiffs' proposed notice to putative collective members, and to resubmit the proposed notice and consent-to-sue forms for the Court's approval within fourteen days, which falls on the present date of April 15, 2019 (Dkt. #65);

12 The Parties have met and conferred to prepare revised proposed notice and consent-to-sue
13 forms, but have not yet agreed upon final versions for submission to the Court. The Parties are
14 confident that if given seven (7) more days to confer, they will reach an agreement on revised
15 documents to file for the Court's aproval;

STIPULATION

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
18 Plaintiffs and Defendant, through their respective undersigned counsel of record, that:

- 19 1. The Parties will have until April 22, 2019 to resubmit the proposed notice and consent-
20 to-sue forms for the Court's approval, an extension of 7 days;

21 IT IS SO STIPULATED.

22 || DATED: April 15, 2019

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

By: _____ /s/ *Don Springmeyer*
Don Springmeyer, Esq.

Attorneys for Plaintiffs
MAUREEN CLARK and SONYA
ALEXANDER

1 DATED: April 15, 2019

2 **MCGUIREWOODS LLP**

3 By: /s John Van Hook
Michael D. Mandel, Esq.
John A. Van Hook, Esq.

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5 Attorneys for Defendant
BANK OF AMERICA, N.A.

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7 **CERTIFICATE OF SERVICE**

8 I hereby certify that on this 15th day of April, 2019, a true and correct copy
9 of **STIPULATION TO EXTEND TIME FOR PARTIES TO RE-SUBMIT PROPOSED**
10 **NOTICE AND CONSENT-TO-SUE FORMS;** was served via the United States District Court
11 CM/ECF system on all parties or persons requiring notice.
12

13 By /s/ Christie Rehfeld
14 Christie Rehfeld, an Employee of
15 WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MAUREEN CLARK and SONYA
ALEXANDER, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

BANK OF AMERICA CORPORATION,

Defendant.

CASE NO. 2:16-cv-02228- GMN-VCF

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME FOR
PARTIES TO RE-SUBMIT PROPOSED
NOTICE AND CONSENT-TO-SUE
FORMS**

Complaint Filed: September 21, 2016

[PROPOSED] ORDER

Based on the Stipulation of the Parties and good cause appearing, the Court hereby
GRANTS the Parties' Stipulation to Extend Time to Re-submit Proposed Notice and Consent-to-Sue Forms, and Orders as follows:

1. The Parties will have until April 22, 2019 to resubmit the proposed notice and consent-to-sue forms for the Court's approval, an extension of 7 days;

IT IS SO ORDERED.

DATED this 15 day of April, 2019.


Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT